

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

EDWIN HERNANDEZ, ARLES GRANADOS)
LAZO, JOSE ORTEZ, YERLIN ORTEZ,)
MARTIR SOTO, AND SANTOS VELASQUEZ,)
)
)
Plaintiffs,)
)
) Civil Action No. 1:13-cv-10394-WGY
v.)
)
GOLDEN APPLE, INC., POMODORO NORTH)
END, INC., MATT MURPHY'S PUB, INC.,)
SIOBHAN CAREW, AND JONATHAN PELL,)
)
)
Defendants.)

MOTION TO FILE AFFIDAVITS UNDER SEAL

Ellen C. Kearns and Christopher M. Pardo of Constangy, Brooks and Smith, LLP (“Defendants’ Counsel”) respectfully request leave to file under seal the affidavits marked as Exhibits A and B (“Affidavits”) to their Motion to Withdraw Appearances and Request for 60-day Extension of Events for Defendants to Obtain Successor Counsel (“Motion to Withdraw”).

The Affidavits set forth the basis for Defendants’ Counsel’s Motion to Withdraw and include confidential information. Pursuant to the instructions of the Docket Clerk, Defendants’ Counsel is transmitting to the Court the Affidavits by courier today in a package marked “Confidential” in the event the Court would like to review the Affidavits before ruling on this Motion.

For these reasons, Defendants’ Counsel requests the relief sought herein.

Respectfully submitted,

/s/ Christopher M. Pardo
Ellen C. Kearns, Esq.
BBO # 263100
ekearns@constangy.com
Christopher M. Pardo, Esq.
BBO # 674674
cpardo@constangy.com
Constangy, Brooks & Smith, LLP
535 Boylston Street, Suite 902
Boston, MA 02116
Telephone: 617.849.7880
Facsimile: 617.849.7870

Dated: October 25, 2013.

CERTIFICATE OF CONSULTATION

I, Christopher M. Pardo, hereby certify that I conferred with counsel for plaintiffs in advance of filing this motion and was unable to narrow the issues raised herein.

/s/ Christopher M. Pardo
Christopher M. Pardo

Dated: October 25, 2013.

CERTIFICATE OF SERVICE

I, Christopher M. Pardo, hereby certify that, on this 25th day of October, 2013, this document was filed through the CM/ECF system and will be sent electronically to the following registered participants as identified on the Notice of Electronic Filing:

Michaela C. May, Esq.
P.O. Box 441944
Somerville, MA 02144-1944

/s/ Christopher M. Pardo
Christopher M. Pardo